

Amy M. Samberg (NV Bar No. 10212)
amy.samberg@clydeco.us
Justin S. Hepworth (NV Bar No. 10080)
justin.hepworth@clydeco.us
CLYDE & CO US LLP
7251 W. Lake Mead Blvd., Suite 430
Las Vegas NV 89128
Telephone: 725-248-2900

*Attorneys for Defendant The Travelers
Home and Marine Insurance Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANDREAS YANIK,

Plaintiff,

v.

THE TRAVELERS HOME AND MARINE
INSURANCE COMPANY,

Defendant.

CASE NO.: 2:24-cv-01409-RFB-BNW

**STIPULATION AND ORDER TO
CONTINUE DISCOVERY
DEADLINES (FIRST REQUEST)**

Plaintiff Andreas Yanik (“Plaintiff”) and Defendant The Travelers Home and Marine Insurance Company (“Travelers Home”), by and through their respective counsel of record, pursuant to Local Rule 26-3, hereby request the Court extend all discovery deadlines by ninety (90) days. This is the first stipulation to extend discovery deadlines.

A. Statement Specifying Discovery Completed.

The parties have exchanged initial disclosures prior to a settlement conference that was conducted on December 11, 2024.

Travelers propounded written discovery to Plaintiff on January 21, 2025. Plaintiff served his responses to Travelers’ First Set of Requests for Admission on February 20, 2025. After a requested extension, Plaintiff served his responses to Travelers’ First Set of Requests for Production

1 and Travelers' First Set of Interrogatories on March 6, 2025. The parties are currently engaging in
2 the meet and confer process relating to Plaintiff's responses to this written discovery.

3 Travelers also propounded subpoenas to AirBnB and VRBO/Homeway in January 2025.
4 After some difficulties in serving those subpoenas, Travelers recently received responsive
5 documents from VRBO/HomeAway on February 24, 2025, and responsive documents from
6 AirBnB on March 11, 2025. Travelers also propounded a subpoena on the public adjuster (Lioness
7 Claims) in January 2025. After multiple extensions and follow-ups, Travelers finally recently
8 received responsive documents from the public adjuster on March 7, 2024.

9 Upon review of Plaintiff's discovery responses and the documents received in response to
10 the subpoenas to AirBnB, VRBO/HomeAway and the public adjuster, Travelers has prepared
11 additional subpoenas which are in the process of being served to the following: Steven Dameron;
12 Alliance Environmental Group, LLC; Elite Brothers Construction, LLC; McBride Environmental,
13 LLC; One Claim Solution, LLC; RentManager.com; Amrock, Inc.; Angel Oak Mortgage Solutions,
14 LLC; Central Cabinets Direct, Inc.; and Loan Factory, Inc. Travelers is awaiting responses to these
15 subpoenas.

16 **B. Specific Description of the Discovery that Remains to be Completed.**

17 The parties are still waiting for responses to the subpoenas described above which may lead
18 to the need to additional subpoenas.

19 The parties need to complete the meet and confer process on Plaintiff's written discovery
20 responses. Depending on the results of that meet and confer process, the parties may need to engage
21 in motion practice, supplementation of the discovery responses and/or additional written discovery.

22 Once responses to all the subpoenas have been received and the dispute over Plaintiff's
23 written discovery responses has been finalized, Travelers intends to take the following depositions:
24 (a) Plaintiff Andreas Yanik; (b) Tatiana Yanik; (c) Viola Sulahian; (d) Ardi Karademir; (e) Alex
25 Yanik, (f) Ivan Anitchuck; (g) Shayane Bayot; (h) Person(s) Most Knowledgeable for Lioness
26 Claims LLC; (i) Person(s) Most Knowledgeable for Elite Brothers Construction, LLC; (j) Steven
27 Dameron; and (k) Alberto (last name unknown). Travelers will also want to depose any expert
28 identified by Plaintiff. Additionally, once responses to all of the subpoenas have been received and

1 the dispute over Plaintiff's written discovery responses has been finalized, Travelers will be able
2 to identify the appropriate additional experts.

3 **C. Reasons Why the Deadline Was Not Satisfied or the Remaining Discovery Was Not**
4 **Completed Within the Time Limits Set by the Discovery Plan.**

5 As mentioned above, the parties engaged in an early settlement conference in the hopes of
6 resolving this matter. To avoid any unnecessary costs relating to discovery given the hopes for
7 resolution, the parties delayed commencing discovery until after their settlement discussions
8 reached an impasse. Shortly afterward the settlement conference, Travelers served written
9 discovery on Plaintiff in January 2025. After Travelers granted an extension, Plaintiff responded to
10 the written discovery by March 6, 2025. Travelers believes the written discovery responses are
11 deficient or otherwise in need of supplementation. The parties are currently engaged in the meet
12 and confer process concerning those discovery responses. Depending on how those meet and confer
13 efforts proceeds, the parties may need to engage in motion practice, supplementation of discovery
14 responses and/or additional written discovery. Travelers is also waiting for responses to numerous
15 subpoenas. Once the discovery dispute has been resolved and the responses to all subpoenas have
16 been received, Travelers will finally be able to start conducting depositions of the relevant fact
17 witnesses. Travelers' experts are in need of the discovery described above to properly prepare their
18 reports. The parties will not be able to complete the meet and confer process on the written
19 discovery, receive responses to the remaining subpoenas, and take the depositions of facts witnesses
20 before the upcoming expert disclosure deadline of April 3, 2025. As a result, the parties request a
21 90-day extension of all discovery deadlines to accommodate this discovery and ensure adequate
22 time to prepare expert reports.

23 **D. A Proposed Schedule for Completing all Remaining Discovery.**

- 24 (1) Initial Disclosure Deadline: This deadline has already passed and is now closed.
25 (2) Discovery Cut-Off Date: September 18, 2025
26 (3) Amending Pleadings and Adding Parties: This deadline has already passed and is now
27 closed.
28 (4) Expert Disclosures: July 21, 2025

1 (5) Rebuttal Expert Disclosures: August 19, 2025

2 (6) Dispositive Motions: October 17, 2025

3 (7) Pretrial Order: November 17, 2025

4 (8) Fed. R. Civ. P. 26(a)(3): The disclosures required by this rule and any objections to them
5 must be included in the joint pretrial order. Unless the court orders otherwise, these
6 disclosures must be made at least 30 days before trial.

7 Dated: March 21, 2025

8 BOWEN LAW OFFICES

CLYDE & CO US LLP

9 /s/ Jerome R. Bowen

/s/ Justin S. Hepworth

10 Jerome R. Bowen
11 Nevada Bar No. 4540
12 9960 W. Cheyenne Ave, Suite 250
13 Las Vegas, Nevada 89129
14 Telephone: (702) 240-5191
15 E-mail: jrbowen@lvlawfirm.com
16 *Attorneys for Plaintiff Andreas Yanik*

Justin S. Hepworth (NV Bar No. 10080)
7251 W. Lake Mead Blvd., Suite 430
Las Vegas NV 89128
Telephone: 725-248-2900
E-mail: justin.hepworth@clydeco.us
*Attorneys for The Travelers Home and
Marine Insurance Company*

17 **ORDER**

18 IT IS SO ORDERED.

19 

20 United States Magistrate Judge

21 Dated: 3/25/2025

CERTIFICATE OF SERVICE

As an employee of Clyde & Co US LLP, I certify that a copy of the foregoing
**STIPULATION AND ORDER TO CONTINUE DISCOVERY DEADLINES (FIRST
REQUEST)** was served by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☒ **BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Registered Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: March 21, 2025

/s/ Maricris Williams
An Employee of Clyde & Co US LLP